

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LHB INSURANCE BROKERAGE INC., On
Behalf Of Itself and All Others Similarly
Situating,

Plaintiff,

- against -

CITIGROUP, INC. and CITIGROUP GLOBAL
MARKETS, INC.,

Defendant.

Case No. 08-cv-3095 (LTS)

LISA SWANSON, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

- against -

CITIGROUP INC., CITIGROUP GLOBAL
MARKETS, INC., and CITI SMITH BARNEY,

Defendants.

Case No. 08-cv-3139 (LTS)

SAMUEL A. STOCKHAMER and ALICE L.
STOCKHAMER, On Behalf of Themselves and
All Others Similarly Situated,

Plaintiff,

- against -

CITIGROUP INC. and CITIGROUP GLOBAL
CAPITAL MARKETS, INC.,

Defendants.

Case No. 08-cv-3904 (LTS)

WEDGEWOOD TACOMA LLC, Individually
and On Behalf of All Others Similarly Situated,

Plaintiff,

- against -

CITIGROUP INC., CITIGROUP GLOBAL
MARKETS, INC., and CITI SMITH BARNEY,

Defendants.

Case No. 08-cv-4360 (UA)

**THE DIGNAM GROUP'S SUPPLEMENTAL RESPONSE IN
CONNECTION WITH PENDING MOTIONS FOR CONSOLIDATION
AND FOR APPOINTMENT OF LEAD PLAINTIFF AND LEAD
COUNSEL**

Class members David Dignam and Ted Link (collectively, the “Dignam Group”) respectfully submit this supplemental response in connection with the pending motions for consolidation and appointment of Lead Plaintiff and lead counsel, pursuant to the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(a)(3)(B).

In briefing before the Court, competing movants have challenged the adequacy of two Lead Plaintiff applicants, Dr. Michael A. Passidomo and the Wedgewood Tacoma/Jemstone Group, and the financial interest of the LHB Insurance Brokerage Group. The Dignam Group takes no position with respect to these challenges under the PSLRA.

If the Court has concerns as to whether any of these applicants should be appointed as Lead Plaintiff, however, the Dignam Group is prepared to serve as Lead Plaintiff or Co-Lead Plaintiff for the Class. As described in prior briefing, the Dignam Group is comprised of two individuals who collectively hold \$1,350,000 in illiquid auction rate securities they purchased from Citigroup during the Class Period. The Dignam Group also satisfies the typicality or adequacy requirements of Federal Rule of Civil Procedure 23, and no other Lead Plaintiff applicant has questioned the Dignam Group’s typicality or adequacy to represent the Class.

Counsel for the Dignam Group are uniquely qualified to represent the Class, as they have been appointed as Lead Counsel in two other broker-dealer class actions arising from the collapse of the auction rate securities market, and are representing clients who have sought appointment as Lead Plaintiff in eight other cases.¹ These cases all share common legal claims and theories, and are premised on the same underlying facts and alleged wrongful conduct,

¹ Counsel for the Dignam Group have been appointed Lead Counsel in *Waldman v. Wachovia Corp., et al.*, 08-cv-2913 (SAS) (S.D.N.Y.), and *Oughtred v. E*TRADE Financial Corp., et al.*, 08-cv-3295 (SHS) (S.D.N.Y.). Counsel also represent clients seeking appointment as Lead Plaintiff in *Kraemer v. Deutsche Bank AG, et al.*, 08-cv-2788 (LAP) (S.D.N.Y.); *Humphrys v. TD Ameritrade Holding Corp., et al.*, 08-cv-2912 (PAC) (S.D.N.Y.); *In re UBS Auction Rate Securities Litigation*, 08-cv-2967 (LMM) (S.D.N.Y.); *Burton v. Merrill Lynch & Co., Inc., et al.*, 08-cv-3037 (LAP) (S.D.N.Y.); *Miller v. Morgan Stanley & Co., Inc.*, 08-cv-3012 (AKH) (S.D.N.Y.); *Defer LP v. Raymond James Financial, Inc., et al.*, 08-cv-3449 (LAK) (S.D.N.Y.); *Grossman v. Oppenheimer & Co., Inc., et al.*, 08-cv-03528 (LAP) (S.D.N.Y.); and *Van Dyke v. Wells Fargo & Co., et al.*, 08-cv-1962 (JSW) (N.D. Cal.).

adding to the efficiency with which the Dignam Group could prosecute this case. Counsel for the Dignam Group are well-qualified to represent the interests of the Class, as they have investigated the auction rate securities market since its collapse in February 2008, filed several auction rate securities class actions, including one of the pending actions against Citigroup, been contacted by more than 2,000 auction rate securities investors, and have retained consultants knowledgeable in auction rate securities.

Counsel for the Dignam Group will attend the Lead Plaintiff hearing on June 24, 2008, and will be prepared to address any questions or concerns of the Court at that time.

DATED: June 20, 2008

Respectfully submitted,

GIRARD GIBBS LLP

By: Jonathan K. Levine
Jonathan K. Levine (JL-8390)

Daniel C. Girard
Aaron M. Sheanin
601 California Street, 14th Floor
San Francisco, CA 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846

Norman E. Siegel
STUEVE SIEGEL HANSON LLP
460 Nichols Road, Suite 200
Kansas City, MO, 64112
Telephone: (816) 714-7100
Facsimile: (816) 714-7101

Christopher A. Seeger (CS-4880)
Stephen A. Weiss (SW-3520)
David R. Buchanan (DB-6368)
SEEGER WEISS LLP
One William Street, 10th Floor
New York, NY 10004
Telephone: (212) 584-0700
Facsimile: (212) 584-0799

Counsel for David Dignam and Ted Link

CERTIFICATE OF SERVICE

I, Jonathan K. Levine, hereby certify that on June 20, 2008, I caused the following document(s) to be filed electronically with the United States District Court for the Southern District of New York through the Court's mandated ECF service:

- 1. THE DIGNAM GROUP'S SUPPLEMENTAL RESPONSE IN CONNECTION WITH PENDING MOTIONS FOR CONSOLIDATION AND FOR APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL**

Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the document(s) upon confirmation of e-filing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20th day of June, 2008 at San Francisco, California.

/s/ Jonathan K. Levine